

1 **THE HONORABLE JOHN C. COUGHENOUR**

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9 **UNITED STATES DISTRICT COURT**
10 **WESTERN DISTRICT OF WASHINGTON**
11 **AT SEATTLE**

12 JAMES S. GORDON, Jr., a married
13 individual, d/b/a
14 'GORDONWORKS.COM'; OMNI
INNOVATIONS, LLC., a Washington
limited liability company;

15 Plaintiffs,

16 v.

17 VIRTUMUNDO, INC, a Delaware
18 corporation d/b/a
ADNOWLEDGEMAIL.COM;
19 ADKNOWLEDGE, INC., a Delaware
20 corporation, d/b/a
ADKNOWLEDGEMAIL.COM;
SCOTT LYNN, an individual; and
JOHN DOES, 1-X,

21 Defendants.

No. CV06-0204JCC

STIPULATION AND [PROPOSED] ORDER
MODIFYING CUTOFF FOR DISCOVERY
MOTIONS

22
23 **STIPULATION**

24 WHEREAS, pursuant to Fed. R. Civ. P. 16(f), the last court day to complete discovery
25 and file and serve motions to compel discovery is December 15, 2006.
26

1 WHEREAS, the parties have met and conferred pursuant to Fed. R. Civ. P. 37
 2 regarding Defendants' allegations that Plaintiffs have (i) failed to respond in full to "Defendant
 3 Scott Lynn's First Set Of Interrogatories And Requests For Production Of Documents To
 4 Plaintiffs Omni Innovations, LLC., and Plaintiff Gordon" (the "Lynn Requests"); and (ii) that
 5 Plaintiffs' prior production of documents, specifically the emails at issue in this lawsuit, is
 6 deficient.
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8 WHEREAS, the parties have agreed to extend the time for Plaintiffs to respond to the
 9 Lynn Requests to Wednesday, December 20, 2006 at 5:00 pm.

10 WHEREAS, the parties have agreed to extend by one (1) week to December 22, 2006
 11 Defendants' deadline for filing discovery motions for relief related to (i) Plaintiffs' responses,
 12 or lack thereof, to the Lynn Requests; and (ii) the form and contents of Plaintiffs' prior
 13 production of documents.
 14

15 DATED this 15th day of December, 2006.

16 NEWMAN & NEWMAN, LLP
 17 Attorneys for Defendants

MERKLE SIEGEL & FRIEDRICHSEN, P.C.
 Attorneys for Plaintiffs

18 
 19 By _____
 20 Derek A. Newman, WSBA # 26967
 Roger M. Townsend, WSBA # 25525

/s/ Robert Siegel with authorization
 By _____
 Robert J. Siegel WSBA# 17312

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ORDER

Pursuant to stipulation of counsel, it is hereby ORDERED, as follows:

1. Plaintiffs' deadline for providing its discovery responses is extended five (5) calendar days to December 20, 2006 at 5:00 p.m.

2. Defendants' deadline for filing discovery motions related to the Lynn Requests, and Plaintiffs' prior document production of the emails in this lawsuit is extended seven (7) calendar days to December 22, 2006;

All other dates and schedules shall remain unmodified.

DATED this _____ day of _____, 2006.

THE HONORABLE JOHN C. COUGHENOUR
UNITED STATES DISTRICT JUDGE